## UNITED STATES DISTRICT COURT **DISTRICT OF MASSACHUSETTS**

Mary Oberther, on behalf of herself and all others similarly situated,

: Civil Action No.: 3:14-cv-30014-MGM

Plaintiff,

v.

Midland Credit Management, Inc.,

Defendant.

## MOTION FOR ATTORNEY'S FEES AND COSTS AND APPROVAL OF **INCENTIVE AWARD**

PLEASE TAKE NOTICE that Plaintiff Mary Oberther, by and through Class Counsel, hereby moves the Court to (1) approve and award attorney's fees and costs in the amount of \$60,000.00 to Class Counsel, and (2) approve an incentive award of \$2,000 to Plaintiff Mary Oberther for her services to the class.

In support, Plaintiff submits the accompanying memorandum of law and affidavits in support.

Plaintiff respectfully requests that the Court rule on this Motion for Attorney's Fees and Costs at the Final Approval Hearing scheduled for July 13, 2016.

Dated: May 11, 2016

Respectfully submitted:

/s/ Stephen Taylor

Sergei Lemberg Stephen Taylor

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## **CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2016, a copy of the foregoing was filed with the Clerk of the Court via the Court's CM/ECF system which sent notice of such filing to the following:

Andrew Schwartz Marshall Dennehey Warner Coleman & Goggin, P.C. 2000 Market Street, Suite 2300 Philadelphia, PA 19103

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> <u>/s/ Stephen Taylor</u> Stephen Taylor